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Hearing Date: Dec. 20, 2023
Opposition Date: Sept. 22, 2023
Reply Date: Oct. 23, 2023

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff,

Plaintiff,

v.

BNP PARIBAS – DUBLIN BRANCH,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 22-01087 (CGM)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of BNP
Paribas – Dublin Branch’s Motion to Dismiss and all prior pleadings and proceedings herein,

BNP Paribas – Dublin Branch (“BNPP Dublin”) will move this Court remotely via Zoom¹ on December 20, 2023 at 10:00 a.m. (prevailing Eastern time) for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, dismissing the Trustee’s claims with prejudice.

PLEASE TAKE FURTHER NOTICE that pursuant to the agreement of the parties, the Trustee’s response will be due on September 22, 2023, and BNPP Dublin’s reply will be due on October 23, 2023.

Dated: July 24, 2023
New York, New York

Respectfully submitted,

/s/ Thomas S. Kessler

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¹ Judge Cecelia G. Morris, <https://www.nysb.uscourts.gov/content/chief-judge-cecelia-g-morris> (last visited July 18, 2023) (“Judge Morris is holding all hearings via Zoom.”)